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Attorneys for Creditors
MARINA GELMAN and MIKHAIL GELMAN

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-3008 (DM).

Case No. 19-30088 (DM)

Chapter 11

(Lead Case - Jointly Administered)

**DECLARATION OF DAVID W. WESSEL
IN SUPPORT OF MARINA AND
MIKHAIL GELMAN'S SUPPLEMENT TO
THEIR MOTION FOR RELIEF FROM
AUTOMATIC STAY AND ABSTENTION
PURSUANT TO 28 U.S.C. 1334(c)(1);
OBJECTION TO THE BANKRUPTCY
COURT ADJUDICATING MOVANTS'
PERSONAL INJURY CLAIMS**

Date: September 10, 2019

Time: 9:30 a.m.

Ctrm: Hon. Dennis Montali

450 Golden Gate Avenue

16th Floor, Courtroom 17

San Francisco, CA 94102

Reply Deadline: September 5, 2019
At 4:00 Pacific Time

1 I, David W. Wessel, declare:

2 1. I am the attorney for Marina Gelman and Mikhail Gelman. I make this declaration
3 on their behalf.

4 2. I am their attorney in *Gelman v. Pacific Gas & Electric Company*, Case No.
5 CGC-17-556763 in the Superior Court of California, County of San Francisco.

6 3. Attached as Exhibit 1 is page 2 to Mikhail Gelman's answers to PG&E's Judicial
7 Council Interrogatories in *Gelman v. Pacific Gas & Electric Company*. His answer to Interrogatory
8 No. 2.2 shows he was born in Russia on November 6, 1941. Thus, he is 77 and will be 78 in less
9 than three months.

10 4. Yesterday I spoke with his wife, Marina Gelman, who told me that Mikhail Gelman
11 is in poor health. He is declining physically and mentally. I also spoke with their daughter, Nicole,
12 who told me the same thing.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing
14 is true and correct and that I signed this declaration in Portola Valley, California, on August 20,
15 2019.

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18 /s/ David W. Wessel
19 (SBN: 115222)

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EXHIBIT 1

1 **Interrogatory No. 2.1:**

2 State:

- 3 a) your name;
4 b) every name you have used in the past; and
5 c) the dates you used each name.

6 **Response to Interrogatory No. 2.1:**

- 7 a) Mikhail Gelman
8 b) No other names

9 **Interrogatory No. 2.2:**

10 State the date and place of your birth.

11 **Response to Interrogatory No. 2.2:**

12 Rossosh, Vorone Region, Russia 11/6/1941

13 **Interrogatory No. 2.3:**

14 At the time of the incident, did you have a driver's license? If so, state:

- 15 a) the state or other issuing entity;
16 b) the license number and type;
17 c) the date of issuance; and
18 d) all restrictions.

19 **Response to Interrogatory No. 2.3:**

20 Not applicable. There were no cars involved in this incident.

21 **Interrogatory No. 2.4:**

22 At the time of the incident, did you have any other permit or license for the operation of a motor
23 vehicle? If so, state:

- 24 a) the state or other issuing entity;
25 b) the license number and type;
26 c) the date of issuance; and
27 d) all restrictions.

28 **Response to Interrogatory No. 2.4:**

Not applicable.

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